

IN THE UNITED STATES DISTRICT COURT  
 FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
 JOHN RICHARD JOE  
 Plaintiff

Civil Action No. 00-0004

12/15/00

Vs.

U.S. District Judge Ramo  
 Magistrate Judge Smyser

FILED  
 HARRISBURG

DEC 14 2000

MARY E. D'ANDREA, CLERK  
 Per                       
 DEPUTY CLERK

DR. ROBERT CLARK, et al.  
 Defendants.

MOTION FOR LEAVE TO FILE PLAINTIFF'S BRIEF IN  
 OPPOSITION TO CORRECTIONS DEFENDANTS' MOTION TO  
 REVOKE PLAINTIFF'S IN FORMA PAUPERIS STATUS AND  
 TO DEFER FILING OF RESPONSIVE PLEADING TO PLAINTIFF'S  
 AMENDED COMPLAINT WHICH EXCEEDS FIFTEEN  
 (15) PAGE LIMIT AND BRIEF IN SUPPORT

COMES NOW, the Plaintiff and Pro Se Counsel in the above entitled  
 Civil Action, John Richard Joe, as a layman unlettered in the Arts  
 Sciences of the Law & Legal Procedures within the United States,  
 now files his Motion For Leave To File Plaintiff's Brief In Opposition  
 To Corrections Defendants' Motion To Revoke Plaintiff's In Form  
 Pauperis Status And To Defer Filing Of Responsive Pleading To  
 Plaintiff's Amended Complaint Which Exceeds Fifteen (15) Page  
 Limit And Brief In Support, herein & who, avers, deposes & states

## I. The Motion

1. For & based upon the reasons & arguments set forth  
 herein, infra, Plaintiff John Richard Joe, moves this court, pursuant  
 to M.D. LR 7.8, for an order granting him leave to file his Brief  
 In Opposition To Corrections Defendants' Motion To Revoke Plaintiff

In Forma Pauperis Status And To Defer Filing of Responsive Pleading To Plaintiff's Amended Complaint which Exceeds Fifteen (15) Page Limit, herein this Civil Action.

## II. BRIEF In Support

Plaintiff avers & submits, that M.D. LR 7.8 requires that: "No brief exceeding fifteen (15) pages shall be filed without prior authorization. Any motion for such authorization shall specify the length of brief requested and shall be filed at least two (2) working days before the brief is due."

Pursuant to M.D. LR 7.8, Plaintiff avers & submits that he requests authorization to file a brief which is thirty (30) pages in length, herein this case.

This Court and the parties will benefit from a more extensive argument than can be accomplished in just fifteen (15) pages.

This Court has allowed this Plaintiff to file briefs longer than fifteen (15) pages in his other CIVIL RIGHTS Actions/cases pending before this Court & should likewise do so herein this case.

The interests of justice & fundamental fairness will best be served by allowing this Plaintiff to file a brief, herein this case, which is thirty (30) pages in length.

Plaintiff has enough paper & will not need another enlargement of time to file this long BRIEF, herein:

(W) HEREOF, Plaintiff John Richard Jae, Prays that this Court will enter an order granting him leave to file his BRIEF in opposition to Corrections Defendants' motion to Revoke Plaintiff's In Forma Pauperis status and to defer filing of responsive pleading to Plaintiff's Amended Complaint, herein the case which is thirty (30) pages in length =

AND HE SHALL EVER PRAY  
RESPECTFULLY SUBMITTED.

(S) John Richard Jae  
MR. JOHN RICHARD JAE,  
Plaintiff and Pro Se Counsel

Dated: 11th DECEMBER 2000

MR. John Richard Jae,  
# BQ-3219  
SCI-Glen/SMU  
175 Progress Drive  
Waynesburg, PA 15370

Joe vs. Clark et al.  
CIVIL No. 1:00-CV-001090  
CERTIFICATE OF SERVICE

I, John Richard Joe, hereby certify that I am the  
11th day of December, 2000, serving a true & correct  
Carbon Copy of the Plaintiff's Motion for ~~Leave to~~  
~~File Plaintiff's Brief in Opposition to Correction~~

File Plaintiff's Brief in Opposition to Correction  
Defendants' Motion to Revoke Plaintiff's Informal  
Pauper's Status and to Defers Filing of Response  
Pleading to Plaintiff's Amended Complaint which  
Exceeds Fifteen (15) Page Limit and Brief to support  
by 1st class mail, postage pre-paid & addressed to:

MR. James D. Young, Esquire  
LAVERY, FAHERTY, YOUNG & PATTERSON, P.C.  
Attorneys at Law  
P.O. Box 1245  
Hampersburg, PA 17108-1245

MR. Robert M. Wolff,  
Asst. Counsel  
Pa. Dept. of Corrections  
Off. of Chief Counsel  
55 Utley Dr.  
Camp Hill, PA 17011

Dated/Executed on:  
11th December 2000:  
At: Waynesburg, Pennsylvania:

(S) John Richard Joe  
MR. John Richard Joe  
Plaintiff & Sec. Can